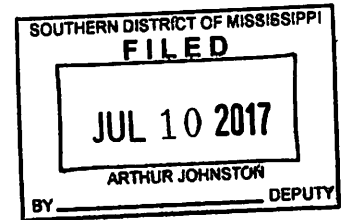


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION



SCOTT AND JENNIFER BERRY, INDIVIDUALLY
AND ON BEHALF OF THE MINOR CHILDREN
C.W.B, RLC, C.C, AND A.A.D, AND C.D.B
PLANTIFF(S)

VS.

Civil Action No. 1:17cv81-HSO- JEC

FELEE' SIMMS, INDIVIDUALLY AND AS AN AGENT
FOR MISSISSIPPI DEPARTMENT
OF HUMAN SERVICES
AND JOHN AND JANE DOES 1-10
DEFENDANT(S)

ANSWER

COME NOW, Defendant Feelee' Simms; individually, and files her answers to the complaints as follows:

1. Defendant denies all allegations.
2. Defendant denies all allegations.
17. Defendant denies all allegations. Insufficient and /or inaccurate information has been provided.
18. Defendant denies all allegations.
19. Defendant denies all allegations.
20. Defendant Affirms in part based on her knowledge of the incident, but Denies that injury was sustained.
21. Defendant denies all allegations.
22. Defendant denies all allegations.
23. Defendant Affirms in part based on her knowledge of the incident, but Denies that injury was sustained.
24. Defendant denies all allegations.
25. Defendant denies all allegations.
26. Defendant denies all allegations.
27. Defendant denies all allegations.
28. Defendant denies all allegations.
29. Defendant denies all allegations.
30. Defendant denies all allegations.
31. Defendant denies all allegations.
32. Defendant denies all allegations.
33. Defendant denies all allegations.
34. Defendant denies all allegations.
35. Defendant denies all allegations.
36. Defendant denies all allegations.
37. Defendant denies all allegations.
38. Defendant denies all allegations.
39. Defendant denies all allegations.
40. Defendant denies all allegations.
41. Defendant denies all allegations.
42. Defendant denies all allegations.
43. Defendant denies all allegations.
44. Defendant denies all allegations.

- 45. Defendant denies all allegations.
- 46. Defendant denies all allegations.
- 47. Defendant denies all allegations.
- 48. Defendant denies all allegations.
- 49. Defendant denies all allegations.
- 50. Defendant denies all allegations.
- 51. Defendant denies all allegations.
- 52. Defendant denies all allegations.
- 53. Defendant denies all allegations.

COUNT II: DEPRIVATION OF FOURTEENTH AMENDMENT

- 54. Defendant denies all allegations
- 55. Defendant denies all allegations.
- 56. Defendant denies all allegations.
- 57. A, B, C, and D; Defendant denies all allegations.

COUNT V: DEPRIVATION OF FOURTH AMENDMENT CONSTITUTIONAL RIGHTS

- 55. Defendant denies all allegations
- 56. Defendant denies all allegations.

FIRST DEFENSE

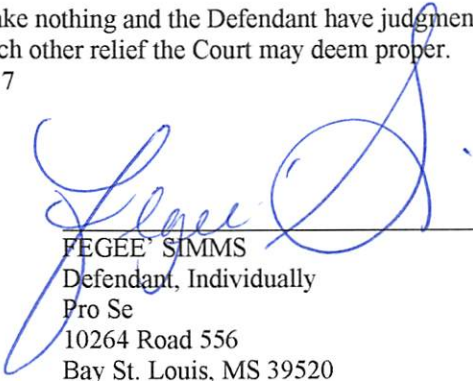
Some or all of the claims are barred by the State of Mississippi's sovereign immunity and/or the defendant's legislative or absolute immunity.

SECOND DEFENSE

Defendant answering the complaint, herein alleges that all allegations and counts brought forth therein fail to state a claim to which relief can be granted.

REQUEST FOR RELIEF

WHEREFORE, Defendant prays that the Plaintiff take nothing and the Defendant have judgment against the Plaintiffs and recover the costs of suit herein, and such other relief the Court may deem proper.
Respectfully submitted, this the 10 day of July, 2017

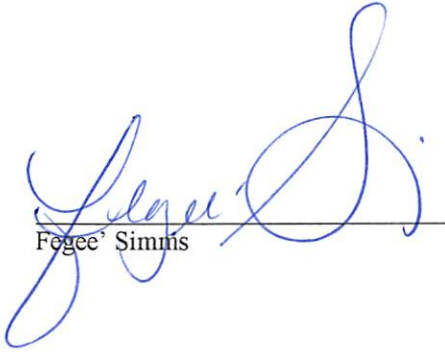


FEGEE SIMMS
Defendant, Individually
Pro Se
10264 Road 556
Bay St. Louis, MS 39520
(504) 896-0714

CERTIFICATE OF SERVICE

I hereby certify that on the 10 day of July, 2017, I delivered a true and correct copy of the foregoing Defendant's Answer via hand delivery to:

Edward Gibson
153 Main St.
Bay St. Louis, Mississippi 39520
Tel: (228) 467-4225



Fegée Simms